

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
NO. 5:18-CR-00452-1-FL  
NO. 5:18-CR-00452-2-FL

UNITED STATES OF AMERICA )  
 )  
 v. ) **CONSENT MOTION TO EXTEND**  
 ) **CERTAIN DEADLINES IN**  
 ) **SCHEDULING ORDER**  
 )  
 LEONID ISAAKOVICH TEYF and )  
 TATYANA ANATOLYEVNA TEYF )

Defendants, Leonid Isaakovich Teyf and Tatyana Anatolyevna, by and through counsel, hereby move the Court to extend certain deadlines in the Court's Order of September 10, 2019 (DE 334), as set forth below. Counsel for the Government consents to the requested extension. In further support of this motion, Defendants show the following:

1. As the Court is aware, this is a complex case. The Fourth Superseding Indictment alleges fifty (50) Counts on disparate matters and seeks forfeiture of numerous valuable assets and accounts. Not surprisingly, discovery produced to date is voluminous.
2. The parties negotiated the proposed schedule embodied in the 9/10/19 Order backed off of a proposed trial date of February 18, 2020. The Order set the trial date to begin March 16, 2020
3. A number of submissions are due from Defendants on Monday, January 13, including:
  - a. Pre-trial Motions;
  - b. Defense Objections/Consent to US transcripts;

- c. Defense Designation of Audio and Proposed Transcripts for defense designations;
- d. Reciprocal Discovery by Defendants; and
- e. Defense Expert Notice and Reports.

4. Defendants will be filing their pre-trial motions on or before the deadline on Monday, January 13.

5. In light of the complexity of the case and volume of discovery, however, counsel for Defendants need additional time to complete the other deadlines.

6. Following discussion, counsel for the Government consents to the following extensions:

- a. Defense Objections/Consent to US transcripts: 2 weeks, until January 27, 2020;
- b. Defense Designation of Audio and Proposed Transcripts for defense designations: 2 weeks, until January 27, 2020;
- c. Reciprocal Discovery by Defendants: to be provided prior to the depositions of foreign witnesses; and
- d. Defense Expert Notice and Reports: until February 7, 2020.

7. Counsel for Defendants have continued working diligently through the voluminous discovery in the case to date. Counsel also continues to evaluate the many issues in the case and defense of same, as part of efforts to provide effective representation to Mr. Teyf on complex issues. The requested additional time will facilitate the effective representation to which these and any defendants are entitled.

8. The requested extension of deadlines will not delay the trial, set for March 16, 2019.

9. This Motion is made in good faith and not for purposes of delay. Neither the Government nor Defendants will be prejudiced by the extensions requested herein.

WHEREFORE, Defendants respectfully requests that the Court extend the deadlines set forth in the Court's Order of September 10, 2019 (DE 344) as requested above. A proposed Order is submitted with this motion.

Respectfully submitted, this the 10<sup>th</sup> day of January, 2020.

/s/ F. Hill Allen

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 10<sup>th</sup> day of January, 2020, I electronically filed the foregoing **CONSENT MOTION TO EXTEND DEADLINES** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

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